

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

UNITED STATES OF AMERICA,

V.

Criminal Action No.: 5:21-cr-00023

RICHARD E. MOORE,

Defendant.

MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

COMES NOW the Defendant, Richard E. Moore, through Standby Counsel, and files the following:

1. By Order of this Court entered June 21, 2024, the Court deemed Defendant to have elected to proceed *pro se*, and also appointed Standby Counsel. (Dkt. No. 91.)
2. Defendant Moore is currently incarcerated at Middle River Regional Jail, where he has no access to the Internet, Email, legal research materials, etc. Standby Counsel has consulted with Defendant, and files this Motion on Defendant's behalf and at his request.
3. By Order of this Court entered July 8, 2024, (Dkt. No. 93), the Court Ordered Moore to file a Response to two Government Motions in Limine (Dkt. Nos. 53 and 59).
4. Standby Counsel is familiarizing himself with the case as quickly as possible, but the volume of information and discovery is massive.
5. Standby Counsel believes that the granting of a two-week extension to file a response to the above-referenced Motions would be sufficient, such that Standby Counsel could assist Defendant Moore in drafting a cogent response to these Motions. Standby Counsel discussed this matter with Mr. Montague, who stated that he had no objection to the granting of a two-week extension.

6. Standby Counsel is very aware of the posture of this case, and the delays that have occurred. However, Standby Counsel requests the Court to grant this Motion, so that he may provide advice to and consult with the Defendant.

Respectfully submitted,
Richard E. Moore
By Standby Counsel

/s Gregory W. Bowman
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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of August, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties.

/s Gregory W. Bowman
Gregory W. Bowman